

# Sulfuryl Fluoride Label Interpretation

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**Date established**                      October 27, 2010

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**Enclosure to Enforcement Letter**                      ENF 10-21

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**Purpose**                      This letter identifies certain label and labeling differences between the three Sulfuryl Fluoride (SF) products currently registered for structural pest control use in California – Vikane, Zythor, and Drexel Master Fume. These differences have implications for fumigators and for regulatory staff when conducting structural fumigations.

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**Background**                      Each pesticide product label must follow specific requirements for label language and format as required by the United States Environmental Protection Agency (U.S. EPA). However, within that framework, each product label may have some differences which can range from minor to significant regarding enforcement implications.

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**Definition of label and labeling**                      **Label:** The “written, printed, or graphic matter on, or attached to, the pesticide or device or any of its containers or wrappers.” (Product Container Label)

**Labeling:** “All labels **and** all other written, printed, or graphic matter:

   a. accompanying the pesticide or device at any time; or

   b. to which reference is made on the label or in literature accompanying the pesticide or device, (e.g. Applicator Manual), **except** to current official publications of the Environmental Protection Agency, the United States Department of Agriculture and Interior, the Department of Health and Human Services, State experiment stations, State agricultural colleges, and other similar Federal or State institutions or agencies authorized by law to conduct research in the field of pesticides.”

Ref: FIFRA, section 2(p)

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## Sulfuryl Fluoride Label Interpretation, Continued

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### US EPA mandate re: SF structural labeling

The product label and the applicator manual constitute labeling and **must** be in the possession of the fumigator during all phases of the structural fumigation process.

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### Label/Labeling reference dates

The information provided is based upon sulfuryl fluoride labeling registered by DPR at the time this Enforcement letter was issued.

Vikane (EPA Reg#62719-4) label: 3/3/10; manual: 3/10/10

Zythor (EPA Reg#81824-1) label: 5/20/09; manual: 5/20/09

Drexel Master Fume (EPA Reg#19713-596) label: 12/9/09; manual: 12/9/09

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### Label/Labeling differences

At this time, key differences amongst the three DPR registered sulfuryl fluoride fumigants are:

- 1) Types of **storage bags** for items requiring “double bagging” that will remain in the structure:
  - Vikane labeling only allows the use of Nylofume™ bags.
  - Zythor labeling allows the use of Nylofume™ bags or Fumigard bags
  - Drexel Master Fume labeling allows the use of Nylofume™ bags, Fumigard bags, or Master Fume bags.

Thus, using storage bags not specifically named on SF product labeling constitutes a violation of Food and Agricultural Code (FAC) § 12973

- Example: Use of Fumigard or Master Fume bags while fumigating with Vikane constitutes a violation of FAC § 12973.
- Example: Use of Master Fume bags while fumigating with Zythor constitutes a violation of FAC § 12973.
- However, use of Nylofume™ bags while fumigating with Zythor, or Drexel Master Fume is **not** a violation of FAC § 12973

- 2) **Dosage calculation system/programs** for sulfuryl fluoride and chloropicrin:

- Use of dosage calculation system programs is **product specific**.
- Example: Calculating the amount of sulfuryl fluoride or chloropicrin needed to fumigate a structure with the Fumiguide system, but then fumigating with Zythor or Drexel Master Fume would constitute a violation of FAC § 12973.

- 3) **Removal (or not) of items** prior to fumigation

- See specific information below
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## Sulfuryl Fluoride Label Interpretation, Continued

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### DPR label interpretation

DPR's interpretation in ENF 2005-05 defined toothpaste, mouthwash and other dental hygiene products entering the mouth as a drug or medicinal. Therefore **double-bagging or removal from the structure is required prior to fumigation unless specifically exempted by labeling language.**

This information can be found in the Pesticide Use Enforcement Standards Compendium, Volume 4, Chapter 7, Form 107 criteria item for Labeling-Bagging.

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### Vikane specific labeling

The recently revised Vikane applicator manual approved by DPR on March 10, 2010 contains additional language that specifically **exempts** dental hygiene products, and certain other household items from the requirement to **double-bag or remove** from the structure prior to fumigation.

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### Enforcement implications

Vikane labeling now **allows** fumigators to leave dental hygiene products (including toothpaste, mouthwash, dental adhesives, and dental whitening products), cosmetics including lipstick, all externally applied lotions and ointments, ice and water in a structure to be fumigated without double-bagging.

Zythor and Drexel Master Fume current labeling **does not** include similar language.

Fumigators using either Zythor or Drexel Master Fume who leave the same specific opened items in a structure to be fumigated without double-bagging **would be in violation** of that product's labeling (FAC § 12973).

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### Review each label before inspections

It is imperative that fumigators and enforcement regulatory staff review the labeling for each specific sulfuryl fluoride product. Fumigators prior to applying (introducing the gas); regulatory staff prior to inspecting structural fumigations.

It is the responsibility of the fumigator to follow each sulfuryl fluoride product's labeling to avoid violations.

Product labels typically change more frequently than do applicator manuals; compliance/enforcement actions are based upon the product label and applicator manual at the site at the time of an inspection/investigation.

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### Questions

If you have questions, please contact your Enforcement Branch Liaison